

Places for Everyone Representation 2021

<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a>
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>It has not been properly legally established that GMSF and PfE can be treated as the same plan. There have been substantial changes made to PfE 2021 (even if I think few are improvements) and this new plan needs proper judicial review to ascertain that it complies with Regulation 18 of the Town and Country Planning Regulations before it can proceed further.</p> <p>The plan has used 2014 data to forecast housing need and should use the more up-to-date ONS population predictions of 2018. Forecast of the growth in the number of households are also unreliable and actual, local evidence of growth for recent years should be relied upon too. The plan fails to take into account the impact of Brexit on population figures and the changes to working patterns brought about by Covid. There also appears to be no account taken of the retail space that has/will become available for conversion to housing due to the changes in shopping patterns accelerated by the pandemic.</p> <p>The way sites have been selected is incoherent and requires further scrutiny. Clear explanations of why sites have been chosen or rejected should be made available to local people. Some green belt sites seem to have been chosen merely for their size and then other areas added to local green belt provision almost as a sop or to be able to say that not such a high percentage has been sacrificed. There is no proof of exceptional circumstances required in the National Planning Policy Framework to support this.</p>

	<p>I do not feel that the council has adequately publicised the full impact of the plan. Most people I know/talk to are not fully aware of it. Even the names GMSF and the new Places For Everyone are obscure and do not hint at the real scope of this project. Plans to Concrete over any Remaining Green Lungs would at least give people a clear understanding of the outcome of the adoption of the plan. I feel strongly also that the timing of this consultation is not acceptable. Local people have been traumatised by Covid-19 and Greater Manchester residents have been impacted more than those in other areas. Many have suffered bereavement, illness, job loss or just sheer work exhaustion and to ask them to consider these proposals over the summer period when they were trying to enjoy desperately-needed summer breaks was ill judged. The constraints imposed on responding are confusing and off putting to anyone not well versed in the English language or planning-speak. I have really struggled and have regretfully had to resort to 3rd party help or risk not getting my strongly-held opposition to this version of PfE across. For these reasons alone I believe the plan to be unsound.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>This plan needs to go back to Regulation 18 of the Town and Country Planning Act and be positively prepared with proper timely public engagement and consultation.</p>
<p><b>Family Name</b></p>	<p>Armstrong-Bell</p>
<p><b>Given Name</b></p>	<p>Cathy</p>
<p><b>Person ID</b></p>	<p>1287562</p>
<p><b>Title</b></p>	<p>Our Strategic Objectives</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>  <a href="#">PFE1287562_Letter_Redacted.pdf</a>  <a href="#">PFE1287562_SOSElton.pdf</a>  <a href="#">PFE1287562_SOSWalshaw.pdf</a></p>
<p><b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b></p>	<ol style="list-style-type: none"> <li>1. Meet our housing need</li> <li>2. Create neighbourhoods of choice</li> <li>3. Ensure a thriving and productive economy in the districts involved</li> <li>4. Maximise the potential arising from our national and international assets</li> <li>5. Reduce inequalities and improve prosperity</li> <li>6. Promote the sustainable movement of people, goods and information</li> <li>7. Ensure that districts involved are more resilient and carbon neutral</li> <li>8. Improve the quality of our natural environment and access to green spaces</li> <li>9. Ensure access to physical and social infrastructure</li> <li>10. Promote the health and wellbeing of communities</li> </ol>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>NA</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>NA</p>

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<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Please see the attached supporting documents and read them in detail. I fully concur with all the points raised therein that explain why the plan fails on all of the above.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Please see the attached supporting documents and read them in detail. I fully concur with all the points raised therein that explain why the plan fails on all of the above.
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	Our Spatial Strategy
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant,</b>	GMCA made the decision to move a poorly prepared plan forward to the publication stage of the Town and Country Planning Act even though major changes have been made to the plan since its last round of public consultation. For example, Stockport withdrew and Manchester City Council had had a 35% uplift applied to their housing targets. This means the plan

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<b>is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	had changed significantly and should go back to residents for a further, proper consultation.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The plan needs to go back for proper consultation with Greater Manchester Residents as previously stated.
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 1 Core Growth Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 2 City Centre
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound

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<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 3 The Quays
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 4 Port Salford
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell

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<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 5 Inner Areas
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 6 Northern Areas
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 7 North East Growth Corridor
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a>

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	<a href="#">PFE1287562_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 8 Wigan Bolton Growth Corridor
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 9 Southern Areas
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound

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<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 10 Manchester Airport
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 11 New Carrington
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy



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<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 12 Main Town Centres
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 13 Strategic Green Infrastructure
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-Strat 14 A Sustainable and Integrated Transport Network
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>

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<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>The PFE indicates in Para 1.63 point 2 that the most up-to-date information be used in plan making so, being the most recent, Bury's Housing Development Needs Assessment 2020 must be taken into consideration together with the ONS 2018 forecasts.</p> <p>The site selection process for Bury has been especially opaque. Little information has been given as to why apparently more suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been considered. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GMCA guidelines: <a href="https://www.bury.gov.uk/index.aspx?articleid=16330">https://www.bury.gov.uk/index.aspx?articleid=16330</a>. Radcliffe, the location of Elton Reservoir, has the least expensive housing in Bury, but was elected in preference to sites in other areas where affordable housing is required.</p> <p>Para 11.105 p.264 states that: "Although the allocation has the capacity to deliver a total of 3,500 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant</p>

strategic infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period." Such gross over release of greenbelt is entirely contrary to National Guidelines that regard greenbelt as a precious resource not to be squandered. JPA 7 fails to identify the source of infrastructure funding and, indeed, shortfalls are expected (see para 12.16 of PfE). Site owners, Peel, are not specifically mentioned as being a contributor to the infrastructure funding. Questions should be asked regarding the reasons why Bury Council is offering up such a huge amount of greenbelt at Elton Reservoir that is not required during the plan period instead of retaining it in accordance with National Policy.

Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of Environment, so cannot be considered impartial.

As part of its overall plan Bury has modified greenbelt boundaries so that the loss of greenbelt at Elton Reservoir has been partially offset by creating it in other areas. This has not been adequately justified by exceptional circumstances and is not in accordance with National Policy.

PfE puts the majority of housing in the west of Bury (Elton Reservoir) whilst the jobs will be created on the east side (Northern Gateway) completely on the opposite side of an already congested Bury. The proposed new link road will not resolve this problem as it links one congested area to another.

PfE para 1.42 states that: "The majority of development between 2021 and 2037 will be on land within the urban area, most of which is brownfield land". PfE favours a brownfield first policy as does National Policy. Bury Council have informed Bury residents that they will implement a brownfield first policy, yet they are going for an immediate greenbelt release (see JPA 7 Elton Reservoir Topic Paper PfE 2021, Section 27.9, p.52). When questioned, Councillor Eammon O'Brien (Council meeting 9th September 2021) claimed that the Council would adopt such a policy for anything they built themselves, but had not control over the actions of private developers. They do, as they can limit the release of green belt sites in accordance with National Policy NPPF 134, Part e.

<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Remove JPA 7 allocation Eton Reservoir from the plan.</p>
<p><b>Family Name</b></p>	<p>Armstrong-Bell</p>
<p><b>Given Name</b></p>	<p>Cathy</p>
<p><b>Person ID</b></p>	<p>1287562</p>
<p><b>Title</b></p>	<p>JPA 9: Walshaw</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287562_Letter_Redacted.pdf</a>  <a href="#">PFE1287562_SOSElton.pdf</a>  <a href="#">PFE1287562_SOSWalshaw.pdf</a>  <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a></p>

<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.119, p. 271 of PFE states of the Walshaw allocation: "This is an extensive area of land ... set entirely within the existing urban area. The land is loosely bounded by the urban areas of Tottington to the north, Woolfold and Elton to the East, Lowercroft to the south and Walshaw to the west."</p> <p>Filling in this greenbelt will create an urban sprawl contrary to NPPF para 137 and Par 138 a, b, c and e. There has been no evidence of exceptional circumstances to justify alteration of the greenbelt boundaries to allow building on the Walshaw allocation as is required by the NPPF, para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt. Government guidance states that housing need is not a target, but merely a starting point and figures can be mitigated upwards or downwards according to local circumstances such as a lack of brownfield sites and other factors such as Brexit and Covid. To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF require evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and under-utilised sites and maximising density.</p> <p>Wildlife, flood risk and other site surveys have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of Environment, so must be considered potentially biased. The Housing need Assessment was conducted by Arc4 who have links with the Greater Manchester Housing Partnership which includes Six Town Housing in Bury and so cannot be considered impartial.</p> <p>PfE's proposed employment sites are on the opposite side of Bury to Walshaw. As no direct public transport routes to the employment hubs exist or are proposed, residents would almost certainly opt to travel by car via an already congested Bury. Nor will the proposed new link road at Walshaw ease traffic and could potentially create further congestion. As per the Transport Locality Assessments GMSF 2020, the map at page B9, fig 3 show that the road will start from a mini roundabout on a narrow, residential road, cross a busy main road, enter onto Lowercroft Road at Dow Lane where the road is steep and very narrow. This road will be sending traffic to all the same pinch points this side of the Irwell. It will exacerbate congestion on local roads which are already congested. Furthermore, little account had been taken of the additional traffic created by the recent Andrews housing development nearby. The plan will without doubt increase carbon emissions in the area.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant</b>	Remove JPA 9 allocation Walshaw from the plan.

<b>and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-D1 Infrastructure Implementation
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that the infrastructure can be provided in good time to bring these sites forward within the plan period. This would make the plan undeliverable within the time period, hence making it unsound.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Smaller sites should be considered that would come forward faster like brownfield sites that already have substantial infrastructure provided close by.
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	JP-D2 Developer Contributions
<b>Type</b>	Web

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<b>Include files</b>	<a href="#">PFE1287562_Letter_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_SOSLegality_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	It is well documented that once a site is approved for development it can be reviewed at a later date with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes on the site, density, type and the number that are closed as affordable. In some extremes cases a developer can state inflated development costs and no section 106 payments will come forward.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Local councils need to enter into more housing partnerships and develop land they own instead of selling it and losing control. Salford Council has now created its own housing building company that will deliver affordable homes on land they own and other councils should follow suit.
<b>Family Name</b>	Armstrong-Bell
<b>Given Name</b>	Cathy
<b>Person ID</b>	1287562
<b>Title</b>	Bury - Green Belt Additions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287562_SOSLegality_Redacted.pdf</a> <a href="#">PFE1287562_SOSElton.pdf</a> <a href="#">PFE1287562_SOSWalshaw.pdf</a> <a href="#">PFE1287562_Letter_Redacted.pdf</a>
<b>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</b>	Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe



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	<p>Bury GBA10 Crow Lumb Wood</p> <p>Bury GBA11 Nuttall West, Ramsbottom</p> <p>Bury GBA12 Woolfold, Bury</p> <p>Bury GBA13 Nuttall East, Ramsbottom</p> <p>Bury GBA14 Chesham, Bury</p> <p>Bury GBA15 Broad Hey Wood North</p> <p>Bury GBA16 Lower Hinds</p>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Net greenbelt additions have been nothing but a play on numbers to promote the plan as protecting more greenspace. A lot of the new greenbelt additions are currently not viable for building. This is simply an exercise to take away the protection of greenbelt from useable open spaces and apply them elsewhere in the borough to give the impression that, overall, the net greenbelt percentage loss is less.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	<p>Leave the greenbelt boundaries unchanged and present the true loss of greenbelt land in any further proposals.</p>